

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UNITED PARCEL SERVICE WITNESS LUCIANI  
(USPS/UPS-T4-19-21)

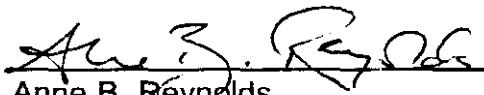
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to United Parcel Service witness Luciani: USPS/UPS-T4-19-21.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2970; Fax -5402  
January 23, 1998

INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
TO UPS WITNESS LUCIANI

USPS/UPS-T4-19. On page 28 of your testimony, you present testimony and data regarding inbound and outbound postal highway movements. Consider the following truck routing: BMC to SCF1 to SCF2 to BMC.

- (a) Which of these legs do you regard as inbound?
- (b) Which of these legs do you regard as outbound?

USPS/UPS-T4-20. Have you studied postal highway capacity utilization as it operated prior to dropship discounts? If so, please provide any such studies and any results.

USPS/UPS-T4-21. Please provide all estimates you have of the percent of inbound space utilized on intra-SCF and inter-SCF vehicles prior to the introduction of dropshipping.

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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Washington, D.C. 20260-1137  
January 23, 1998